

# EXHIBIT 4



1 I'll be candid with you. There has  
2 been some confusion in this case from the prior  
3 attorneys that were handling the case as to  
4 whether or not Ms. Levitt actually suffered a  
5 quote/unquote heart attack.

6 And you have testified that based on  
7 the records that she didn't, in fact, suffer a  
8 heart attack; correct?

9 A. I said that she -- or meant to say she  
10 didn't have a myocardial infarction. But a heart  
11 attack is a lay term that people apply to any  
12 acute coronary syndrome presentation. And she did  
13 have that. And I remember that when I did her  
14 heart cath, it appeared to me that she had active  
15 thrombus in her LAD. So to me that's a heart  
16 attack, but it's not an infarction.

17 Q. That explains that so well for me.  
18 Thank you very much.

19 If I was looking at the operative  
20 report for the stent procedure that was originally  
21 done in March of 2000, what verbiage would I look  
22 for to tell me if this was a base metal stent  
23 procedure or medicated or coated stent procedure?

24 A. Couple things there. I don't think we  
25 were using coated stents until after that time,